

REMARKS

Claims 1-5 and 7-12 are now pending in this application, with claim 1 being the only independent claim. Claim 5 has been rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Claims 1-5 and 7-12 have been rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 4,553,340 to Petersson in view of U.S. Patent No. 6,189,232 to Milosavljevic. In this Amendment, independent claim 1 has been amended to recite “a boundary layer air doctor removably coupled to the second edge of the separate wall.” Support for such amendment can be found at least in claims 7 and 8 as filed. Claims 4-5 and 7 have been amended to address formality issues without narrowing the scope of any of these claims or any claim element contained therein. Claim 6 has been canceled without prejudice. No new matter has been added.

Reconsideration of the subject application in view of the above amendments and the following remarks is respectfully requested.

Remarks Addressing Formality Issues

Claim 5 has been amended to recite “an atmospheric pressure.” In view of such amendments, the formality rejection of claim 5 is believed to have been overcome.

Claimed Invention Is Not Obvious Over Cited Art

Independent claim 1 is allowable

Independent claim 1 recites, at least, “a boundary layer air doctor removably coupled to the second edge of the separate wall and extending substantially unto the surface of one of the cylinders.” The boundary layer air doctor recited in independent claim 1 can be separated from the separate wall and replaced without removing the separate wall from the system.

For the various reasons elaborated below, applicant submits that the above recited claim features are not taught by the cited art because the Office Action provides neither findings as to

where in Petersson the above claim features are taught or suggested nor reasoning that one skilled in the art would modify Petersson to arrive at the above claim features recited in independent claim 1.

The above recited claim features are at least supported by claims 7 and 8, which are considered by the Examiner as constructional details obvious to one skilled in the art (*see*, page 4 of Office Action). Other than the above conclusion, however, the Office Action provides no findings as to where in Petersson such “a boundary layer air doctor” or the removability of such air doctor is taught. Applicant respectfully submits that the above conclusion made in the Office Action is not founded.

First, it is unclear to the applicant what the rational is supporting the above conclusion asserted in the Office Action. If the Office Action takes the position that the recited boundary layer air doctor is an obvious design choice in view of Petersson, applicant respectfully disagrees because the claim element of “a boundary layer air doctor” is completely missing from Petersson. Consequently, there is no component for one skilled in the art to design or otherwise apply design choices to. Rather, one skilled in the art must first conceive a paper web stabilizing arrangement that employs “a boundary layer air doctor” and then devise the same to be “removably coupled to the second edge of the separate wall,” in order to arrive at the subject matter recited in independent claim 1. Petersson neither teaches nor suggests doing so. Therefore, the Examiner’s position that the boundary layer air doctor is an obvious design choice does not stand.

Moreover, the Office Action fails to provide any reasoning that one skilled in the art would modify the cited art to provide such a removable boundary layer air doctor, as now recited in independent claim 1. As is established in the Manual of Patent Examining Procedure (MPEP),

without some rational underpinning to support the legal conclusion of obviousness, rejections on obviousness cannot be sustained with mere conclusory statements (*see*, MPEP § 2142). Also, using applicant's disclosure as a road map to modify prior art to arrive at the claimed invention is improper hindsight and thus impermissible (*see*, MPEP § 2145). Only the present invention teaches the removability of the air doctor.

In view of the above, independent claim 1 patentably distinguishes over the cited art.

Therefore, the rejection of independent claim 1 should be withdrawn.

Dependent claims 2-5 and 7-12 are allowable

Claims 2-5 and 7-12 depend directly or indirectly from independent claim 1 and are therefore allowable for at least the same reasons that independent claim 1 is allowable. In addition, claims 2-5 and 7-12 include features which serve to even more clearly distinguish the claimed invention over the prior art of record.

For example, claim 7 recites that "the boundary layer air doctor is replaceable without removing the support element or the blow box from the paper machine." Petersson, on the other hand, not only is silence about "a boundary layer air doctor," but also teaches a one-piece wall (shielding member 7), which has an upper end 9 connected with the blowing box 10 and a free end 8 extending to the nip area A. There is no teaching in Petersson that any part of the one-piece shielding member 7 can be replaced without removing the blowing box 10 or a support element not exiting in Petersson.

Based on these additional distinctions, claim 7 is allowable for additional reasons.

Conclusion

In view of the foregoing, reconsideration and withdrawal of all rejections, and allowance of all pending claims is respectfully solicited.

Should the Examiner have any comments, questions, suggestions, or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,
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